

5:21-cv-05574-JMG

James Amor, et. al,

v.

Civil Action No: 5:21-cv-05574-JMG

Courtney Conover

Motion to Consider a Counterclaim for Defamation

I would like, at this time, a counterclaim for defamation against the Plaintiffs. I will prove by the end of this motion the Plaintiff, James Amor, is guilty of defamation according to the letter of the law.

James Amor posted a “friends only” post on Facebook on May 23, 2022. James Amor has 1,735 friends on Facebook. Unlike the evidence he intended to use against me, a private person with only 40 friends on Facebook (Exhibit A), this post was given to an “Authorized User” by law, a Facebook Friend of James Amor, Kayla Miller.

According to Civil Case Ehling v. Monmouth-Ocean Hospital Service Corp., No. 2:11-cv-03305 (WJM) (D.N.J. Aug 20, 2013, a person is an “Authorized User” if they are a Facebook Friend of the party who posted the information, and those people are legally allowed to spread it to whomever they choose, provided the initial source is identified and is a Facebook friend. In this case, Kayla Miller is a Facebook Friend of James Amor, and therefore, she had direct access to do as she pleased as an “authorized user” by law. (Video provided by Ms. Miller showing this relationship is attached to this email.)

Kayla Miller provided me with this post yesterday, and it reached 1,735 people. My blog has only reached 392 people in the last 6 months (Exhibit B). So, I argue that although this is listed as “friends only”, given that he is far easier to find and has 4.5x’s the number of views and viewers that I have on a “public” blog, I believe this should be considered far more public.

The post in question is Exhibit C.

(1) The defamatory character of the communication.

The publication of a quote by author Maria Consiglio describing Narcissists and Grooming assumes the party described is a “*narcissist*”: A person who “*doesn’t have a sense of self, so they mimic who they are with. They do this on purpose because the only way they know how to get things in life is by manipulation. They form fake connections to manipulate you into the relationship...*”

(2) Its publication by the defendant.

It was published to 1,735 people on Facebook and also directly to those “Friends” who have access to this original post. This could be in the tens of thousands.

(3) Its application to the plaintiff.

James Amor states in the comments to a person named Trisha Caldwell, “They were guests and not anyone you would know, but they did sucker in a few people from faire into their little scheme. Presently I am suing the guilty party in Federal court for defamation. It’s quite the process.” This proves the post is about me. (Exhibit C)

(4) The understanding by the recipient of its defamatory meaning.

James Amor understands his statements are false, as he knows that he has been friends with a man who has been accused multiple times of sexual misconduct with underage girls under his watch and he never notified the authorities as required by his primary profession, and he regularly blamed the victims as though they were at fault for a man in his 40s sexually assaulting or harassing them. This has been proven multiple times through testimonies by Brianna Kube, Kayla Miller, and Samantha Snow. Michael Menendez confirmed he left due to James Amor’s abhorrent behavior toward the cast in 2019.

James Amor has no access to my medical records and therefore would be unable to diagnose me as a “Narcissist”, which is an official DSM-V diagnosis, “Narcissistic Personality Disorder”. I have never displayed any of these symptoms, and I am not diagnosed with such a disease. Claiming I do is something he would not be aware of, and therefore, he should know it’s a false statement. This has been made recklessly and negligently.

James Amor claims I have no sense of self and mimic anyone I am with in order to manipulate them. Being the opposite in personality to Brianna Kube from the beginning, and her bringing that fact up regularly, already disproves that. She would be able to testify to our vast differences in personality from the very beginning. This is a lie he, again, knows to be true and can be proven easily false.

(5) The understanding by the recipient of it as intended to be applied to the plaintiff.

I fully understand by virtue of reading his comments that this is about me.

(6) Special harm resulting to the plaintiff from its publication.

These statements are false and can be spread throughout the Festival Community to deprive me of entering the Festivals as patrons and to take photographs for my photography hobby. I regularly supply certain acts with promotional photography. This would be impossible if many believed this psychiatric allegation to be factual when it is not.

(7) Abuse of a conditionally privileged occasion.

James Amor listed no reason to post this other than frustration and damage to his own ego. He has zero privilege to post a defamatory post and commentary that he knew to be false in order to win sympathy from the Renaissance Community and ensure I am ostracized from attending as a patron. There is no public concern listed. He received this information from no one. He simply made it up out of frustration to his own ego. This is unacceptable and should be considered clear defamation by law.

Given this abhorrent and clearly reckless and negligent defamation of my character to over 1,700 people (and more if/when shared), I submit this counterclaim for defamation. I am requesting damages in the amount of \$75,000 due to the clear intent to smear me publicly without any evidence or knowledge whatsoever, merely as an emotional outburst. I have

5:21-cv-05574-JMG

provided the court with multiple statements from multiple people and have photographic and screenshot evidence to back every claim I've made and to show the court I did not make any of this up, but it was relayed to me by several others, and I published it. The only reason for this post is to smear my name without any factual basis.

Courtney Conover

Courtney Conover

June 8, 2022]

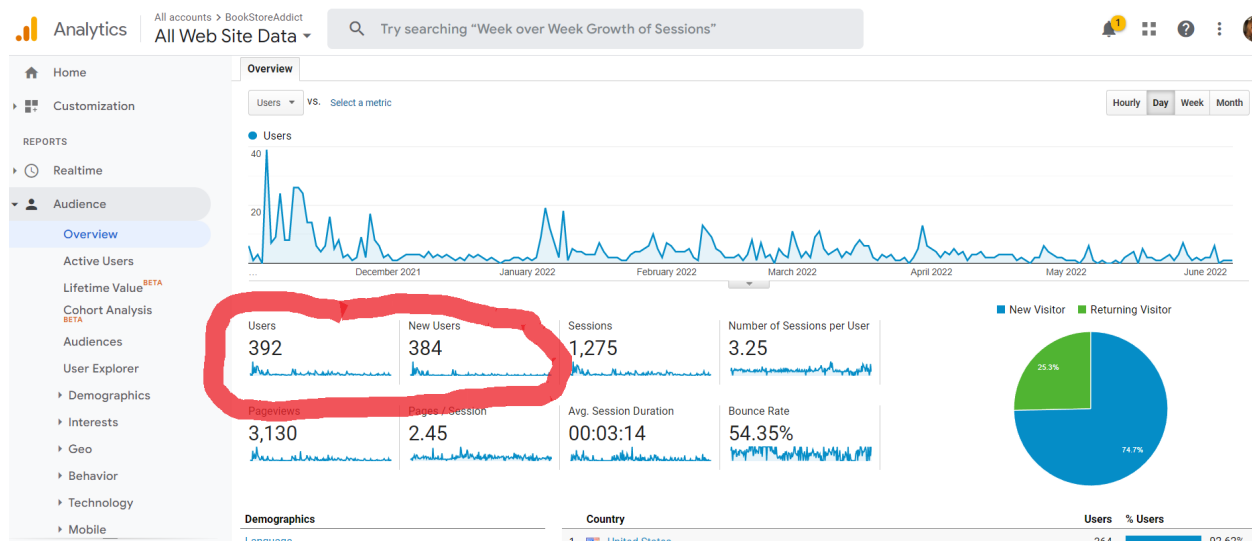
5:21-cv-05574-JMG

EXHIBIT A

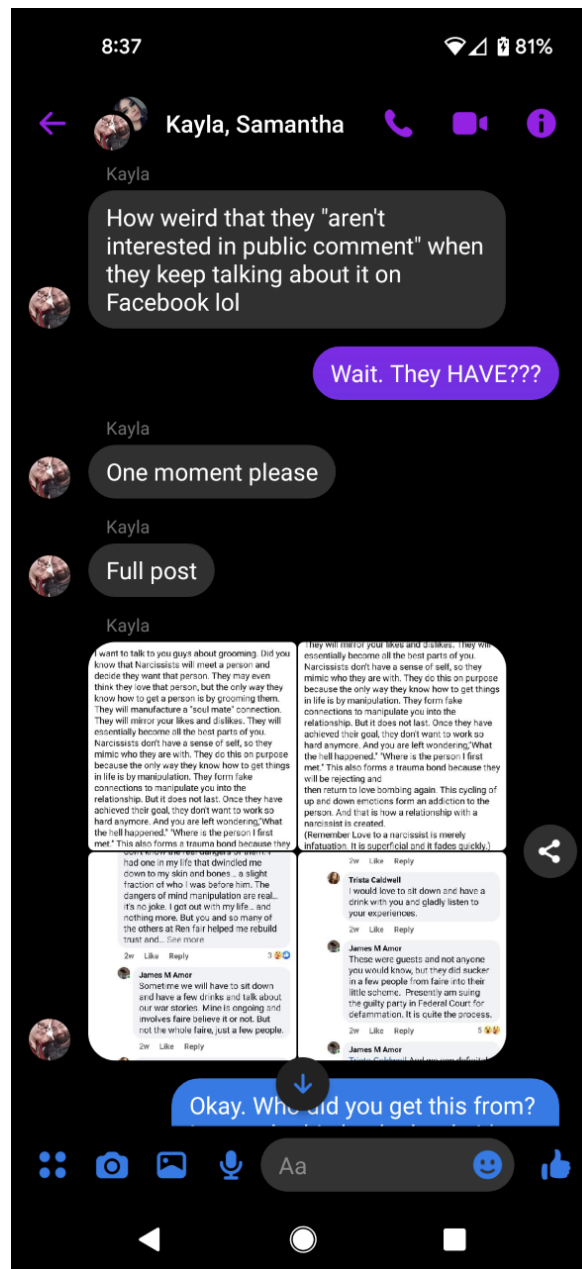


5:21-cv-05574-JMG

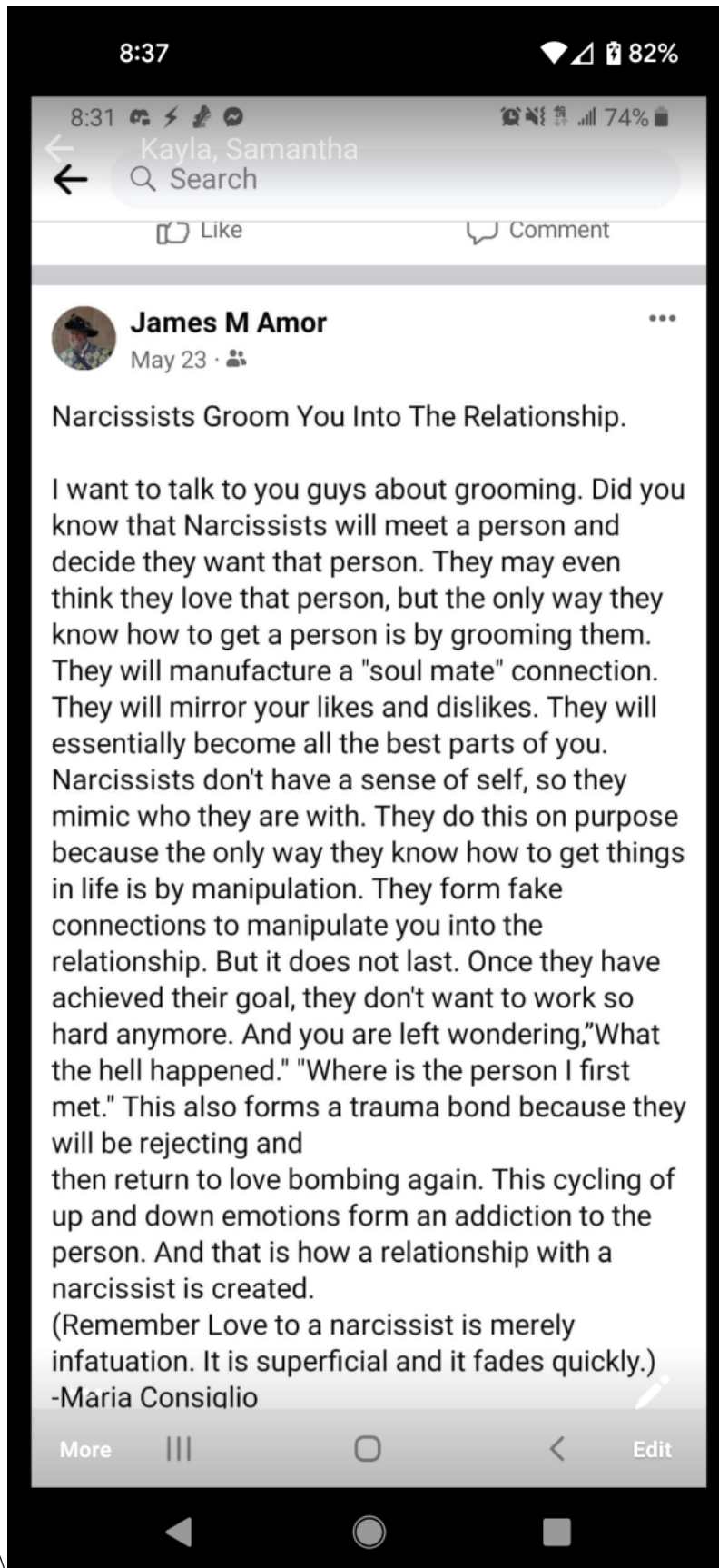
EXHIBIT B



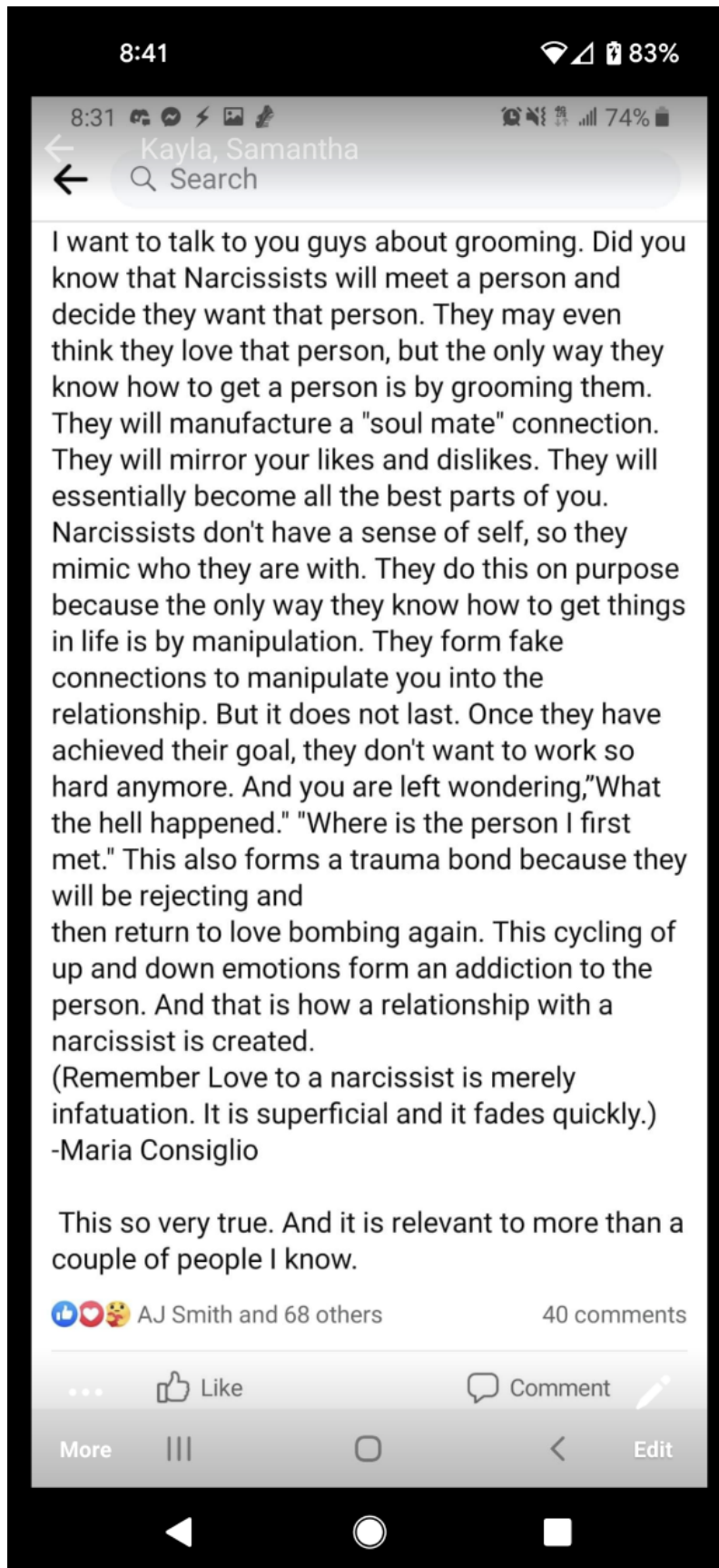
5:21-cv-05574-JMG

EXHIBIT C

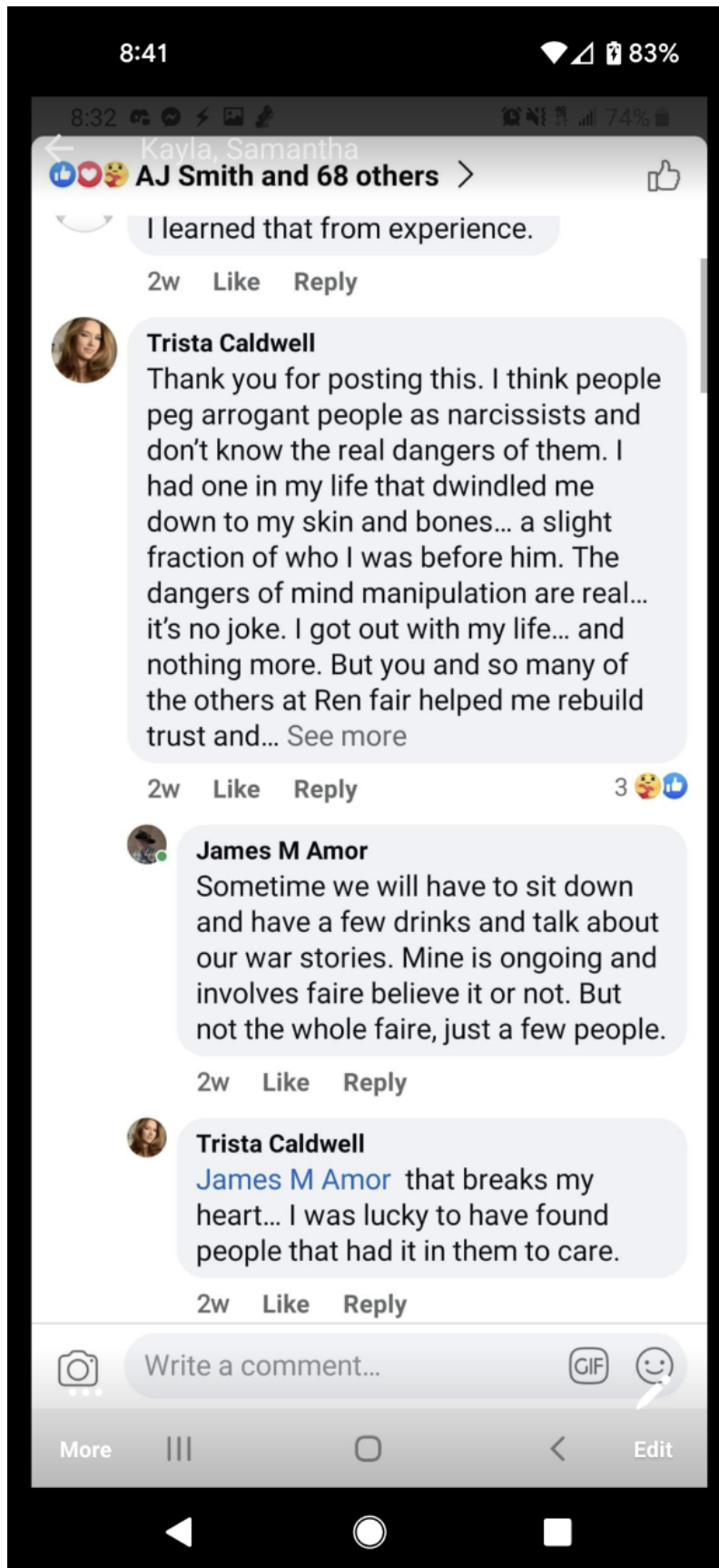
5:21-cv-05574-JMG



5:21-cv-05574-JMG



5:21-cv-05574-JMG



5:21-cv-05574-JMG

